

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	DECLARATION IN SUPPORT
	:	OF FINAL ORDER OF
SABITRI LAFOREST,	:	<u>FORFEITURE</u>
	:	
	:	21 Cr. 272 (CM)
	:	
Defendant.	:	
	:	
	:	
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Matthew R. Shahabian, pursuant to Title 28, United States Code, Section 1746,
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Jay Clayton, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about June 16, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the "Preliminary Order of Forfeiture") (D.E. 131) with respect to SABITRI LAFOREST (the "Defendant"), which forfeited to the United States all right, title and interest of the Defendant in, among other things, the following specific property:

a. One 2020 Ford Shelby GT500 bearing VIN 1FA6P8SJ6L5501627,
(the "Specific Property").

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site (www.forfeiture.gov) beginning on October 10, 2023 for thirty (30) consecutive days, through November 8, 2023, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court August 29, 2024 (D.E. 195).

4. On or about March 6, 2025, Notice of Preliminary Order of Forfeiture was sent by electronic mail: Tracy Vander Linden, Recovery Team/NRC Impounds/Seizures (the “Noticed Party”).

5. On or about June 16, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (D.E. 132) with respect to co-defendant Garry LaForest, which forfeited to the United States all of his right, title and in, among other things, the Specific Property.

6. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

7. The Defendant, Garry LaForest and the Noticed Party are the only individuals and/or entities known by the Government to have a potential interest in the Specific Property.

8. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

9. No previous application for the relief requested herein has been sought.

Dated: New York, New York
June 30, 2025

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/
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